

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

NATIONAL WILDLIFE REFUGE ASSOCIATION, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
RURAL UTILITIES SERVICE, et al.,	)	
	)	Case No. 24-cv-139-WMC
Defendants,	)	
	)	
and	)	
	)	
ITC MIDWEST LLC, and DAIRYLAND POWER	)	
COOPERATIVE,	)	
	)	
Intervenor-Defendants.	)	
	)	
	)	

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**PLAINTIFFS’ MOTION FOR AN EXTENSION OF TIME TO FILE AN AMENDED  
COMPLAINT**

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Plaintiffs National Wildlife Refuge Association, Driftless Area Land Conservancy, and Wisconsin Wildlife Federation (collectively, “Conservation Groups”) respectfully move for leave to amend the current brief scheduling order (Doc. 98), pursuant to Federal Rule of Civil Procedure 6(b)(1) by extending the deadline for Plaintiffs to file an amended complaint to Wednesday, May 22, 2024, and for Federal Defendants and Intervenor Defendants to answer by June 5, 2024.

At a status conference on May 3, 2024, the Court ordered a briefing schedule providing that Plaintiffs had until May 20, 2024, to file an amended complaint. The Court indicated that there was flexibility with its briefing schedule. The Court specifically encouraged the parties to “consult with each other” to reach an agreement “on a slight change,” and “negotiate in good faith to . . .

reach an accommodation . . . that’s acceptable to everyone.” Doc. 99 at 10–11. Plaintiffs now seek two additional days to file an amended complaint, amending the deadline to May 22, 2024, and June 5, 2024, for the Federal Defendants and Intervenor-Defendants to answer. Plaintiffs’ counsel contacted counsel for Federal Defendants and Intervenor-Defendants regarding this request for an extension. Federal Defendants do not oppose this motion. Counsel for Intervenor-Defendants stated that “Intervenor-Defendants assent to the motion on the condition that all subsequent briefing deadlines are also delayed by two days.” Plaintiffs do not agree to moving all subsequent briefing deadlines back two days.

Good cause exists for this extension given the multiple filings Plaintiffs have been working on in the past week on this case both before the district court and the Seventh Circuit. Plaintiffs’ request for a 2-day extension will not cause any unjust delay in this litigation.

Accordingly, Plaintiffs respectfully request that the Court amend the scheduling order, entered on May 3, 2024, as ECF No. 98, to adopt this change.

Respectfully submitted this 20<sup>th</sup> day of May, 2024.

/s/ Howard A. Learner

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